It appears that coordination was performed in reliance on the applicants' representation of huge loading increases, as set forth above. The increases are of sufficient magnitude to warrant Commission pre-grant verification through review of the applicants' billing records for these stations.

The new stations coordinated for Business Radio Inc. are located at the following cities and coordinates, Pullman, Washington at N 46° 51' 44" W 110° 10' 23" and Pomeroy, Washington at N 46° 22' 05" W 117° 34' 50". Business Radio Inc. proposes to operate these stations as conventional, "GX", systems and specifies a loading of 6 units for the Pullman station and a loading of 10 units for the Pomeroy station. These stations are located less than 40 miles from each other in violation of Section 90.623 of the Commission's Rules, as in effect at that time.

---

an existing trunked system, the number of channels that may be assigned to the station(s) authorized to operate that system may not exceed one channel more than its current loading warrants.

ATTACHMENT C

Comm

4643 S. ULSTER STREET
SUITE 1100
DENVER, COLORADO 80237
TEL 303•721•3600

FOR IMMEDIATE RELEASE

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303/294-0044

Anne-Lise Farmer, Motorola
708/538-3113

OneComm to provide integrated wireless communications network in support of Denver International Airport opening

DIA will use integrated, all-digital network for secure communications to help manage 1,600 news media representatives expected to cover opening of nation's first new major airport since 1974.

DENVER (February 23, 1995) – Government officials, aviation staffs and consultants will use OneComm Corporation's integrated, all-digital wireless network to coordinate and manage the flow of some 1,600 reporters expected to cover the opening of the $4.2 billion Denver International Airport on February 28.

OneComm is providing more than 60 "Unicator" handsets to the airport public affairs team and official press secretaries who will be coordinating logistics, arranging on-the-spot interviews, gathering data and generally trafficking reporters throughout a 20-mile area between Denver's Stapleton International Airport and DIA. Each Unicator handset includes combined group and individual two-way radio, mobile phone and alpha-numeric message-paging on OneComm's proprietary – and totally secure – network.

- more -

"OneComm solves a major problem for us because we had no other way of ensuring our team has access to a reliable, secure mobile communications network in an environment that is going to be over-saturated with radios, cellular phones, scanners and other electronic gear," said Diane Koller, DIA Deputy Director of Aviation for Marketing and Government Affairs. "The Unicator is really the only solution for our needs."

DIA officials and media have been told by other wireless communications providers to expect high amounts of dropped calls and busy signals due to the wireless traffic anticipated during the DIA opening and that there can be no assurances that calls will be private.

OneComm's service is based on the fully digital Motorola Integrated Radio System (MIRS) technology, developed by Motorola. Motorola also manufactures the mobile and portable handsets that OneComm markets under the Unicator brand name. "This is the most advanced digital wireless technology available in the world today," said Merle Gilmore, president of Motorola's Land Mobile Products Sector.

The new digital MIRS technology -- often referred to as "enhanced specialized mobile radio," or ESMR -- allows for the multiple use of 800 MHz frequencies, giving OneComm and its customers greater access to available channels.

"The conditions surrounding DIA's opening represent exactly why we created our MIRS-based network," said Mark Dreher, OneComm Area President for the Rocky Mountain Area. "The team using the Unicators needs to be able to communicate as a group and one-to-one through the two-way radio as well as place phone calls and send and receive pages. Rather than carrying around three separate pieces of equipment, we consolidate it all into one powerful, portable handset. And because the conversations are digitally encoded they remain private and secure."

OneComm began commercial service along Colorado's Front Range from Cheyenne, Wyoming to Pueblo, Colorado including Denver and Colorado Springs, in June of 1994. Since then the company has introduced service in the Pacific Northwest including Seattle, Portland and the connecting I-5 corridor. Several other markets in the Midwest will be activated this year.

Last year OneComm announced plans to merge with Nextel Communications, Inc. to create a digital mobile network that will serve 95 percent of the nation's population and all of the top 50 U.S. markets. Nextel's announced plans to merge with Dial Page will give the combined companies the only radio spectrum position covering virtually the entire United States. OneComm and Nextel expect their merger to close in the second quarter of 1995.

- 30 -

ATTACHMENT D

Pittencrieff
Communications, Inc.
One Village Drive, Suite 500
P.O. Box 6088
Abilene, Texas 79608

Phone 915-690-5800
Fax 915-690-5885

December 21, 1994

Dear Dealer:

I'm sure all of you are interested in having your comments known in Washington. Maybe you don't know the process for filing or the expense is a little steep. Well, we will handle all of that for you. Enclosed, you will find the FCC Proposed Rule Making (if you don't already have it), our comments, and the comments of the SBOC.

What we need you to do is give us your name and your full company name. Your address, phone, and fax numbers. A brief description of your company such as how long you have been in business, the service provided, and the area you cover. Put your comments into paragraph form addressing the substance of the FCC's proposal. The deadline for filing the comments is January 5, 1995. We will need to get the comments back from you no later then December 30, 1994 for our attorney to properly handle them.

Please get those to me as quickly as possible by either faxing them to me at 915/690-5885 or Federal Expressing, etc. to me at:

Pittencrieff Communications, Inc.
Attn: Jackie Sinks
One Village Drive, Suite 500
Abilene, Texas 79606

If you have any questions, feel free to give me or my assistant, Tanya Sweeney, a call at 800/599-7230.

Happy Holidays!

Sincerely,

Jackie Sinks

Jackie Sinks
Acquisitions Manager
Pittencrieff Communications, Inc.

JS/ts

Enclosures

ATTACHMENT E

nttached is the first draft of Joint Reply Comments we are preparing. PCIA is picking up the costs. Could I interest you in signing on? AST

ATTACHMENT F

ATTACHMENT F

SMR WON'S CLAIMS OF NEXTEL'S SPECTRUM CONTROL IN CERTAIN NORTHWESTERN STATES IS GROSSLY INACCURATE AND MISLEADING

SMR WON wildly exaggerates Nextel's present and proposed channel holdings, understates those of their members, and misleadingly minimizes the channel capacity available for competitors. For example, SMR WON repeatedly claims that, upon consummation of the OneComm transfer of control, Nextel will control up to 90% of all licensed frequencies in Washington, Oregon and Idaho. This is misleading because it ignores the fact that OneComm reuses those frequencies throughout the region. SMR WON treats all frequencies equally, rather than accounting for the fact that some are reused while others are not. Reuse of frequencies effectively re-mines the spectrum for increased efficiency.

SMR WON computes the number of channels controlled in each area by summing the number of channels licensed at each transmitter site. For example, assume Party A is the licensee of three transmitter sites: Site 1, Site 2 and Site 3. Further assume that 15 channels are licensed at Site 1, 15 channels are licensed at Site 2, and 20 channels are licensed at Site 3. SMR WON would calculate that Party A controls 50 channels (15+15+20 = 50). This calculation is misleading if some of the channels are common at Sites A, B, and/or C, and if these sites are in close proximity to each other -- as is the case in the multiple-site, frequency-reuse designs used in cellular-type systems. If fifteen channels were in

common use at the three sites, then Party A would be in control of only 20 discrete channels.1/

A more meaningful way to determine market presence is to calculate the number of discrete channels licensed exclusively to the licensee, and not shared with another licensee, within the selected geographic area. As an example, Nextel has performed this calculation for two of the states and one of the markets cited by SMR WON. Tabulated below are comparisons of the percentage of channels that would be controlled by Nextel, as calculated by SMR WON, and the percentage of discrete channels that would be licensed exclusively to Nextel after the close of the OneComm and Motorola transactions.2/

1/ In this case, for example, the same 15 channels would be licensed at Sites 1 and 2. These 15 channels plus an additional five channels would be licensed at Site 3. Therefore, Party A is licensed to use 20 discrete channels.

2/ Both the channel counts alleged by Petitioners and Nextel's calculations are based upon the number of channels that would be licensed to Nextel upon the close of both the Motorola and OneComm transactions.

Petitioners, however, computed the percentage of channels that would be licensed to Nextel by comparing them to only those channels licensed to trunked commercial SMR stations, YX stations. Since Nextel has channels licensed in all Part 90 categories except Public Safety, the comparison must be made with all categories of 800 MHz private land mobile stations, except Public Safety. Accordingly, Nextel computed the exclusive use percentage by dividing the number of discrete, exclusive-use channels that would be licensed to Nextel (upon Commission approval and closing of the OneComm and Motorola transactions) by 530 channels, the number of Part 90 800 MHz channels excluding the Public Safety Channels.

Alleged Percentage of Channels Vs. Discrete Percentage of Channels

State	Alleged % Of Channels	Actual % Of Discrete Exclusive Use Channels
Idaho	73%	4%
Washington	96%	13%

Market	Alleged % Of Channels	Actual % Of Discrete Exclusive Use Channels
Sunnyside	92%	41%

Listed below are the details of channel categories found in the above states and market.

IDAHO

Category	Number of Channels
Licensed Exclusively to Nextel	23
Licensed Exclusively to Others3/	109
Shared by Nextel and Others	273
Not Licensed	125

WASHINGTON

Category	Number of Channels
Licensed Exclusively to Nextel	71
Licensed Exclusively to Others	58
Shared by Nextel and Others	380
Not Licensed	21

3/ Since the membership of SMR WON has not been disclosed, it is not possible to determine the number of channels exclusively licensed to its members.

SUNNYSIDE, WA

Category	Number of Channels
Licensed Exclusively to Nextel	219
Licensed Exclusively to Others	45
Shared by Nextel and Others	154
Not Licensed	112

As these comparisons demonstrate, SMR WON has engaged in a clever counting methodology that does not accurately reflect the actual availability of and use of this spectrum, and distorts competitive realities. SMR WON's slipshod analytical practices undermine the credibility of its presentation.

CERTIFICATE OF SERVICE

I, Rochelle L. Pearson, hereby certify that on this 1st day of March, 1995, I caused a copy of the attached Reply Comments to be served by hand delivery to the following:

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